

FEDERAL PUBLIC SERVICE
MINISTRY OF AGRICULTURE AND SUPPLY – MA
DEPARTMENT OF FARMING AND CATTLE
INSPECTION OF PRODUCTS OF ANIMAL ORIGIN
DIVISION OF INTERNATIONAL COMMERCE CONTROL

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Brasilia, 04/19/2002

From: Director, International Control Division - DCI,
From the Department of Inspection of Products of Animal Origin - DIPOA

To: Counselor for Agricultural Affairs
US Embassy

Subject: Noncompliance Report (NR) generated by FSIS after inspection of Brazilian establishments.

Dear Counselor,

In reply to the NR generated by FSIS upon inspection of Brazilian establishments during the period of time between July 11 and August 3rd, 2001, conducted by Dr. Douglas Parks, we would like to further present the following comments.

1. Corrective actions instituted by the establishments upon detection of irregularities during inspection:
 - Dr. Parks' oral observations made during his visits and final meeting with DIPOA were passed on to all accredited establishments for export into the USA through circular-letter 560/01/DCI/DIPOA (Appendix 1).
 - Due to the delay in receiving the NR from the inspection that took place in July/August 2001 and another inspection that occurred in January/February 2002, we would like to relay those corrective actions incorporated by the establishment in reply to Dr. Choudry's oral observations during visits and final meeting with DIPOA (Appendix 2).
 - The fact that we received Dr. Parks' NR after Dr. Choudry's inspection caused a few misunderstandings regarding the comments received during the first inspection. Consequently, several establishments took corrective actions without basing them on the official FSIS report, what caused in specific cases repetition of the irregularity previously detected, due to the fact that the corrective actions instituted were inadequate.
2. Cases of cross-contamination:
 - As highlighted in Dr. Parks' NR, all noncompliance observed during inspection were promptly corrected by plant management.
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3. Inadequate compliance with HACCP, including critical control points selection, determination of critical measurable limits and application of pre-shipment review:
 - Those cases of noncompliance relating to plans SSOP and HACCP were corrected by the establishment where they were detected, according with oral observations made during inspection. All corrective actions, listed in detail for to each facility, will be submitted upon receipt of Dr. Choudry's NR;
 - Pre-shipment Review was instituted in those establishments that were not previously following this procedure;
 - Guidelines for implementation of pre-shipment review, as well as comments regarding HACCP compliance, were sent to all accredited establishments authorized for export into the USA. This was performed through Circular-letter 560/01/DCI/DIPOA (Appendix 1).
4. Deficiencies in knowledge and training in HACCP found in the majority of federal inspectors and staff at the establishment:
 - DIPOA is organizing a training session in HACCP for all MAPA accredited veterinaries and for key management personnel responsible for the plan at the establishment.
 - Training will focus mainly on those deficiencies pointed out by FSIS inspection, as well as risk analysis encompassing all production stages, to determine measurable critical control points and relevant for Public Health, to set measurable critical limits, to include preventive measures, verification and validation procedures, among others.
 - Furthermore, detailed information regarding those deficiencies pointed out during inspection was submitted to the Federal Inspection Services of the exporting establishment through Circular-letter 114/2002/DCI/DIPOA (Appendix 3).
5. Lack of monthly inspections: after March, 2002, monthly inspections will be performed in all establishments exporting meat products into the USA (Appendix 4: Circular-letter 106/02/DCI/DIPOA). As settled during the teleconference between FSIS and DIPOA on February 26, 2002, a proposal of equivalency of the Brazilian quarterly inspections system to the American monthly inspections system will be submitted to FSIS, based on the permanent character of our Federal Inspection Services within the premises of the establishment.

Regarding FSIS 471, the report generated by Dr. Ari Crispim dos Anjos was sent to FSIS through the Embassy of the United States of America. It's receipt was acknowledged by Dr. Parks via e-mail, according to Letter 109/2002 DCI/DIPOA (Appendix 5).

As agreed upon during the teleconference that took place on February 26, 2002 between FSIS and DIPOA, we are enclosing Circular-letters 113 and 115/2002/DCI/DIPOA (Appendix 6) for FSIS evaluation, which are intended to serve as guidelines for veterinaries at the Federal Inspection Service regarding the deficiencies pointed out during inspection.

Sincerely,

Marcelo Vieira Mazzini
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Veterinary – CRMV-RS – 2040
Director, DCI-DIPOA